

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
Plaintiff,) Case No. 10-cv-562-wmc
)
)
)
)
v.)
)
)
)
WOODMAN'S FOOD MARKETS, INC.,)
Defendant.)

The parties, by their undersigned counsel, stipulate as follows:

- (a) The Equal Employment Opportunity Commission (“EOC”) and Woodman’s Food Market’s, Inc. (“Woodman’s”) have begun the discovery process in this case;
- (b) The parties anticipate exchanging documents containing personal and confidential medical information regarding the charging party, Kimberly McMillan-Goodwin (“McMillan-Goodwin”);
- (c) In order to prevent public disclosure of McMillan-Goodwin’s personal and confidential medical information, the parties stipulate to entry of a protective order providing that:
 - (1) Medical records pertaining to McMillan-Goodwin shall be designated as “Confidential” and shall not be disclosed except in connection with this case, except as required by law;

(2) Such medical records shall be shown to clients, witnesses and potential witnesses, including third-party consultants and experts, law firm staff, EEOC staff, court reporters, the Court and Court staff only as necessary to the prosecution of a claim or defense in this action, and shall not be shown to any other person;

(3) Prior to being provided with such medical records, any third-party consultants or experts shall be advised of the existence and contents of the protective order, and the disclosing party shall present such persons with the acknowledgment of their receipt of such advice in the form annexed hereto as EXHIBIT A (“Acknowledgment”). All Acknowledgments presented for signature shall be retained by counsel for the party making the disclosure; and

(4) To the extent it is necessary for either party to file medical records with this Court, such medical records shall be filed under seal under Section IX(B) of the Court’s guide for Administrative Procedures for Electronic Case Filing and Service.

Dated: January 21, 2011

s/Jessica A. Palmer-Denig
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Dated: January 21, 2011

s/Steven C. Zach

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EXHIBIT A

Acknowledgment

The undersigned has read the Protective Order entered in the matter of the Equal Employment Opportunity Commission v. Woodman's Food Markets, Inc., Case No. 10-cv-562-wmc, pending in the United States District Court for the Western District of Wisconsin, and issued as an Order of the Court on _____, 2011. The undersigned agrees to be bound by the terms thereof, and not to disclose any documents designated as Confidential and made available or produced in connection with this litigation (or any copies thereof or the information contained therein) other than in connection with this litigation as provided for in the Protective Order. Additionally, the undersigned submits to the jurisdiction of the Court for any disputes related to, or enforcement of, the Protective Order.

Dated: _____